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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

Case No: 2:20-cr-00274-APG-VCF

11 v.

12 DENZEL RENYAL MICHAEL LOYD,

Protective Order

13 Defendant.

14 In accordance with the Court's Order (ECF No. 55), the parties, by and through the
15 undersigned, respectfully request that the Court issue an Order protecting from disclosure to the
16 defendant DENZEL RENYAL MICHAEL LOYD, the public, or any third party not directly
17 related to this case, any and all unredacted discovery (the "Protected Material") in this case.

18 The parties state as follows:

19 1. On October 6, 2020, a federal grand jury returned an Indictment charging Loyd
20 with four counts of Coercion and Enticement (Counts One, Three, Six, and Nine), three counts
21 of Sexual Exploitation of a Child (Counts Two, Four, and Eight), one count of Transfer of
22 Obscene Material to a Minor (Count Five), one count of Sex Trafficking of Children (Count
23 Seven), and one count of Possession of Child Pornography (Count Ten). ECF No. 1.
24

1 2. The government produced redacted discovery in excess of 1,400 bates-stamped
2 items to defense counsel. The previously produced discovery includes, but is not limited to,
3 police reports, victim and witness interviews, Facebook records, and search warrants.

4 3. The defendant has access to review and obtain copies of all redacted discovery
5 produced by the government to defense counsel.

6 4. On March 22, 2023, Loyd filed a Motion to Compel certain discovery. ECF No.
7 46. On May 4, 2023, the Court granted Loyd's motion in part, and the Court has ordered that
8 the government produce certain discovery unredacted. *See* ECF No 55. The unredacted
9 discovery includes personal identifying information of potential minor victims, witnesses, and
10 unrelated persons to this investigation. The government believes that dissemination of the
11 unredacted discovery ("the Protected Material") could reveal personal identifying information
12 of potential victims, witnesses, and persons unrelated to this investigation.

13 5. In order to protect the potential victims, witnesses, and unrelated persons
14 involved in and revealed by the Protected Material and to comply with the Court's Order (ECF
15 No. 55), the parties intend to restrict access to the Protected Material in this case to the
16 following individuals: attorneys for all parties, and any personnel that the attorneys for all
17 parties consider necessary to assist in performing that attorneys' duties in the prosecution or
18 defense of this case, including investigators, paralegals, experts, support staff, interpreters, and
19 any other individuals specifically authorized by the Court (collectively, the "Covered
20 Individuals"). The defendant DENZEL RENYAL MICHAEL LOYD shall not review or
21 obtain a copy of the Protected Material.

22 6. Without leave of Court, the Covered Individuals shall not:

- 23 a. make copies for, or allow copies of any kind to be made by any other person
24 of the Protected Material in this case or permit dissemination of the Protected

1 Material at the Southern Nevada Detention Center jail facility, or any other
2 detention facility where the Defendant is housed, to include leaving a copy of
3 the Protected Material at any detention facility where the Defendant is
4 housed;

5 b. allow any other person to read, listen, or otherwise review the Protected
6 Material;

7 c. use the Protected Material for any other purpose other than preparing to
8 defend against or prosecute the charges in the indictment or any further
9 superseding indictment arising out of this case; or

10 d. attach the Protected Material to any of the pleadings, briefs, or other court
11 filings except to the extent those pleadings, briefs, or filings are filed under
12 seal.

13 7. Nothing in this stipulation is intended to restrict the parties' use or introduction of
14 the Protected Material as evidence at trial or support in motion practice.

15 8. The parties shall inform any person to whom disclosure may be made pursuant
16 to this order of the existence and terms of this Court's order.

9. The defense hereby stipulates to this protective order.

DATED this 19th day of May, 2023.

Respectfully submitted,

For the United States:

JASON M. FRIERSON
United States Attorney

/s/ Supriya Prasad

SUPRIYA PRASAD
Assistant United States Attorney

For the Defense:

/s/ *Erin Gettel*

ERIN GETTEL

Attorney for DENZEL RENYAL MICHAEL LOYD

IT IS SO ORDERED:

Curtis Baker

May 19, 2023

United States Magistrate Judge

Date